

FILED

NOV 17 2021

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

WENDY E. PARKER,

Defendant.

CRIMINAL NO.

21-30172-SPM

Title 18 U.S.C. §§ 1344(2) and 1028A

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

Bank Fraud – 18 U.S.C. § 1344(2)

1. On or about July 30, 2019, in St. Clair County, within the Southern District of Illinois, the defendant,

WENDY E. PARKER,

did knowingly devise and attempt to execute a scheme to obtain money and funds owned by, and in the custody and control of Citibank, N.A., the deposits of which were insured by the Federal Deposit Insurance Corporation, by means of materially false and fraudulent pretenses, representations, and promises.

2. On or about July 30, 2019, in St. Clair County, within the Southern District of Illinois, the defendant,

WENDY E. PARKER,

for the purpose of executing the aforementioned scheme, and attempting to do so, did knowingly, and with intent to defraud, present to an employee of Best Buy, in Fairview Heights, Illinois, a fraudulent driver's license bearing the name and date of birth of an individual with the initials of

J.B., and caused an application to be submitted to Citibank, N.A. for a credit card in the name of J.B., in order to obtain funds owned by, and in the custody and control of Citibank, N.A.

In violation of Title 18, United States Code, Section 1344(2).

COUNT 2
Aggravated Identity Theft – 18 U.S.C. § 1028A(a)(1)

On or about July 30, 2019, in St. Clair County, within the Southern District of Illinois, the defendant,


WENDY E. PARKER,

knowingly possessed and used, without lawful authority, a means of identification of another person, specifically the name and date of birth of J.B., during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), namely the bank fraud offense charged in Count One, knowing that the means of identification belonged to another actual person.

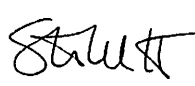
In violation of Title 18, United States Code, Section 1028A(a)(1).

A TRUE BILL

FOREPERSON



ZOE J. GROSS
Assistant United States Attorney



STEVEN D. WEINHOEFT
United States Attorney

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WEINHOEFT
Date: 2021.11.14 22:57:55
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Recommended Bond: \$10,000 Unsecured Bond